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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROGER G. CRANE, JR.,

Plaintiff,

v.

POETIC PRODUCTS LIMITED,

Defendant.

Case No.: 07 Civ. 7063 (BSJ)(FM)

POETIC PRODUCTS LIMITED,

Counterclaimant,

v.

ROGER G. CRANE, JR.,

Counterclaimant Defendant.

**NOTICE OF MOTION FOR STAY OF  
PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE THAT,** upon the annexed supporting memorandum of law, the Rule 56(f) declaration of Christelette A. Hoey, and all prior pleadings filed heretofore herein, the undersigned will move this Court before the Honorable Barbara S. Jones, U.S.D.J., at the United States Courthouse, 500 Pearl Street, Courtroom 2510, New York, New York 10007, at a date and time to be set by the Court, for an Order pursuant to Federal Rule of Civil Procedure 56(f) granting the motion to stay Plaintiff's motion for summary judgment in this matter, or, at a

minimum, to extend the time to respond as detailed in the accompanying memorandum of law submitted by Poetic Products.

A proposed form of order is attached hereto.

Dated: November 28, 2007

Respectfully Submitted,

HOLLAND & KNIGHT LLP

By: 

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